

JAN 08 2020

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

PER

*[Signature]*  
DEPUTY CLERK

UNITED STATES OF AMERICA : NO. 1:20-CR-005  
v. : (JUDGE Jones )  
SHANQUAY RITTER, :  
Defendant. :

**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT 1**  
(Possession with intent to distribute heroin)

On or about April 26, 2019, in York County, within the Middle District of Pennsylvania, the defendant,

SHANQUAY RITTER,  
knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT 2

(Possession with intent to distribute cocaine hydrochloride)

On or about April 26, 2019, in York County, within the Middle District of Pennsylvania, the defendant,

SHANQUAY RITTER,

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT 3

(Possession with intent to distribute cocaine base)

On or about April 26, 2019, in York County, within the Middle District of Pennsylvania, the defendant,

SHANQUAY RITTER,

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

**COUNT 4**

(Possession with intent to distribute fentanyl)

On or about April 26, 2019, in York County, within the Middle District of Pennsylvania, the defendant,

SHANQUAY RITTER,

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

**COUNT 5**

(Possession of a firearm in furtherance of drug trafficking)

On or about April 26, 2019, in York County, within the Middle District of Pennsylvania, the defendant,

SHANQUAY RITTER,

did knowingly possess a firearm, that is, a Glock Model 30 .45 caliber pistol (serial number WTF877), in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute controlled substances.

All in violation of Title 18, United States Code, Section 924(c)(1)(A).

THE GRAND JURY FURTHER CHARGES:

COUNT 6

(Possession of a firearm by a prohibited person)

On or about April 26, 2019, in York County, within the Middle District of Pennsylvania, the defendant,

SHANQUAY RITTER,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce, a firearm, that is, a Glock Model 30 .45 caliber pistol (serial number WTF877).

All in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT 7**

(Influencing Federal official by threat)

On or about May 6, 2019, in York County, within the Middle District of Pennsylvania, the defendant,

SHANQUAY RITTER,

did threaten to assault Paul DeHart, a Federal Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives, with intent to impede, intimidate and interfere with Paul DeHart while he was engaged in the performance of his official duties and with intent to retaliate against Paul DeHart on account of the performance of the official duties of Paul DeHart.

All in violation of Title 18, United States Code, Section 115.

THE GRAND JURY FURTHER FINDS:

**FORFEITURE ALLEGATION**

1. The allegations contained in Counts 1 through 6 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853; Title 18, United States Code, Section 924(d); and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offenses in violation of Title 21, United States Code, Section 841 or Title 18, United States Code, Sections 922 or 924 set forth in Counts 1 through 6 of this Indictment, the defendant,

SHANQUAY RITTER,

shall forfeit to the United States pursuant to Title 21, United States Code, Section 853; Title 18, United States Code, Section 924(d); and Title 28, United States Code, Section 2461(c), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses; any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses; and any firearms and ammunition involved in the commission

of the offenses, including, but not limited to a Glock Model 30 .45 caliber pistol (serial number WTF877).

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

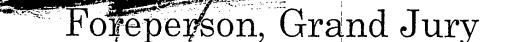
the United States of America shall be entitled to forfeiture of substitute

property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 21 U.S.C. § 853, 18 U.S.C. § 924(d), and 28 U.S.C. § 2461(c).

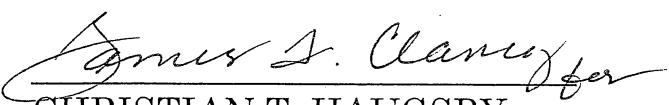
A TRUE BILL

  
Foreperson, Grand Jury

  
1/8/2020

DATE

DAVID J. FREED  
UNITED STATES ATTORNEY

  
CHRISTIAN T. HAUGSBY  
ASSISTANT U.S. ATTORNEY